

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

77 WEST JACKSON BOULEVARD CHICAGO, ILLINOIS 60604

DATE:

07/10/2018

SUBJECT:

CLEAN AIR ACT INSPECTION REPORT

AK Steel Corporation, Middletown, Ohio

FROM:

Gina Harrison, Environmental Scientist

AECAB (MN/OH)

THRU:

Brian Dickens, Section Chief

AECAB (MN/OH)

TO:

File

BASIC INFORMATION

Facility Name: AK Steel Corporation Middletown Works No. 2 Coke Plant

Facility Location: 1801 Crawford Street, Middletown, Ohio 45044

Date of Inspection: May 8, 2018

EPA Inspector(s):

- 1. Gina Harrison, Environmental Scientist
- 2. Marie St. Peter, Environmental Engineer
- 3. Patrick Miller, Environmental Engineer

Other Attendees

- 1. Scott Hamilton, Environmental Scientist, U.S. EPA Region 5 Air Monitoring and Analysis Section
- 2. Justin Coughlin, Environmental Scientist, U.S. EPA Region 5 Air Monitoring and Analysis Section
- 3. Jeff Carney, Operations Manager, AK Steel No. 2 Coke Plant
- 4. Chris Potts, Environmental Manager, AK Steel No. 2 Coke Plant
- 5. Mike Bathe, Environmental Engineer, AK Steel No. 2 Coke Plant
- 6. Jim Kemp, Remediation Manager Environmental Affairs, AK Steel No. 2 Coke Plant
- 7. Ron Toth, Supervisor, Fosbel (contractor to AK Steel No. 2 Coke Plant)
- 8. Ciara Oehring, Environmental Compliance Specialist, Southwest Ohio Air Quality Agency

- 9. Kerri Castlen, Environmental Compliance Supervisor, Southwest Ohio Air Quality Agency
- 10. Mike Kramer, Environmental Compliance Supervisor, Southwest Ohio Air Quality Agency
- 11. Amy Koesterman, Environmental Compliance Specialist, Southwest Ohio Air Quality Agency

Purpose of Inspection: Coke plant inspection

Facility Type: Metallurgical coke plant

Arrival Time: 9:36 AM EDT **Departure Time:** 12:55 PM EDT

Inspection Type:

□ Unannounced Inspection

☐ Announced Inspection

OPENING CONFERENCE

The following information was obtained verbally from Mr. Carney unless otherwise noted.

Process Description:

AK Steel Middletown Works Wilputte Battery manufactures metallurgical coke in one 76-oven four meters tall (in height) vertical flue byproduct coke oven battery and uses one refractory quench tower to quench coke after pushing. The battery and quench tower have been operating since the 1950s. Each of the 76 ovens has two accessible sides described in the permit as the coke side and the push side, for charging and pushing, respectively. Each side of the battery contains two doors per oven – a vertically-oriented, slot type oven door and a chuck door near the top of the oven door.

Production starts around 11 am daily when the coke ovens are charged with a coal blend by transferring coal from the onsite coal bunker into a larry car, positioning the car over the empty oven, and discharging the coal, through a charging port on top of the battery, into the oven.

The coal is heated in the ovens to approximately 2,000 degrees Fahrenheit for a period of approximately 30 hours. The coking process generates coke oven gases, which are drawn away from the ovens to a collection main. The collection main, which serves the entire battery, directs the coke oven gas to the facility's coke by-product recovery plant where condensable materials (i.e., tars and light oils) are removed from the coke oven gas.

Once the coking process has completed, doors along the side of the ovens are opened, and the coke is pushed from the ovens into a railcar called a quench car. The quench car then transports the coke to a quench tower, where water is poured onto the coke in order to cool it. The quenched coke is then dumped onto a coke wharf to drain any excess quench water and to allow the coke to cool further.

A conveyor system then transports the cooled coke to a screening building. The screening building contains a single deck vibrating screen where furnace-sized coke is extracted and subsequently discharged through chutes to railcars. Coke breeze is removed through a discharge chute and transferred to a coke breeze bin. The coke breeze is removed from the bin and transported offsite by trucks.

The raw coke oven gas that enters the byproduct recovery plant is first sprayed with a flushing liquor to shock cool the inlet stream to about 175°F. The cooled coke oven gas is then directed to primary coolers to lower the temperature of the gas even further (to approximately 100°F). The flushing liquor and condensate generated by the cooling process drop down into a tar decanter. The tar removed from the decanter is collected and either sold to offsite customers or blended into the charging coal at the coal preparation area.

The cooled coke oven gas exits the primary coolers and is pulled by an exhauster operated at the byproduct plant through a series of separation units including: tar precipitators, an ammonia scrubber, a light oil scrubber, wash oil preheaters, and a light oil distillation process. The "cleaned" coke oven gas is then vented to a number of onsite and offsite combustion units as a fuel source. The coke oven gas is also recirculated along with blast furnace gas to provide heat to the coke oven battery.

Staff Interview: According to Mr. Carney, the coke ovens are original to the plant and haven't been substantially modified since they were built in the 1950s. The exhauster that pulls coke oven gas from the ovens to the byproduct plant for further processing is controlled both at the byproduct plant control room and by PLC to auto adjust damper settings that control the flow of coke oven gas to the byproduct plant. The quench tower baffles were replaced in December 2017 with dual layer, chevron design baffles to better control PM emissions. The plant was just beginning a ramp up to a daily 60-oven push schedule which will last through the summer.

In accordance with permit requirements, AK Steel personnel perform battery observations on a daily basis to identify potential fugitive emissions from the battery. When fugitive emissions, or leaks, are observed, AK Steel's contractor Fosbel applies silica-based luting materials to seal joints that appear to be leaking visible emissions. According to Mr. Carney and Mr. Toth, areas likely to leak include jointure between the goosenecks and the collection main, offtake lids, trunks, and gaskets, and oven doors. The silica welds typically hold for about 6 months, up to one year. The last few days of traverses and observations performed by AK Steel and Fosbel identified two leaking ovens, which were promptly added to Fosbel's daily repair schedule and repaired.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

Two EPA inspectors traversed the battery doors beginning at 10:43 am and ascended the battery at 11 am. Inspectors observed 4 production cycles from start (flushing and charge) to finish (push and quench). The two inspectors descended the battery at 12:15. Photos were taken during this time and are attached to this report as Attachment A: AK Inspection Photos (in CD format), with a printed log attached as Attachment B: AK Inspection Photo Log.

During this period a third inspector observed charges and pushes at an area to the slight northwest of the battery using a digital opacity camera system (DOCS). Pictures and videos are archived on compact discs, and the results will be documented separately.

Inspectors noted visible emissions leaking from oven doors and components, as follows:

Time	Oven Number	Area of Oven Leaking	
10:43 am	1	Push side, top of oven door	
10:43 am	3	Push side, top of oven door and standpipe	
10:44 am	5	Push side, top of oven door and standpipe	
10:45 am	7	Push side, top of oven door	
10:45 am	10	Push side, top of oven door and standpipe	
10:45 am	11	Push side, top of oven door	
10:45 am	16	Push side, top of oven door	
10:46 am	19	Push side, top of oven door	
10:46 am	22	Push side, top of oven door	
10:46 am	24	Push side, top of oven door and standpipe	

10:46 am	30	Push side, side of oven door
10:47 am	38	Push side, top of oven door and chuck door
10:47 am	40	Push side, top of oven door
10:47 am	42	Push side, top of oven door

Inspectors ascended the battery and observed visible emissions leaking from the following ovens' offtake piping and oven components from 11:00 to 11:18 am:

Time	Oven Number	Area of Oven Leaking
11:00 am	76	Coke side, offtake piping
11:00 am	74	Coke side, valve and offtake piping
11:01 am	70	Coke side, offtake piping
11:01 am	72	Coke side, offtake piping
11:02 am	69	Coke side, offtake piping
11:04 am	68	Coke side, offtake piping
11:04 am	64	Coke side, offtake piping
11:04 am	61	Coke side, offtake piping
11:05 am	60	Coke side, offtake piping
11:06 am	50	Coke side, offtake piping
11:06 am	48	Coke side, offtake piping
11:08 am	46	Coke side, offtake piping and gasket leading to collector main
11:09 am	42	Coke side, offtake piping

11:12 am	38	Coke side, offtake piping and gasket leading to collector main
11:12 am	34	Coke side, offtake piping
11:14 am	31	Coke side, offtake piping
11:14 am	27	Coke side, offtake piping
11:15 am	25	Coke side, offtake piping
11:17 am	24	Coke side, offtake piping
11:18 am	18	Coke side, offtake piping
11:18 am	13	Coke side, offtake piping

Inspectors observed four production cycles and then descended the coke battery at around 12:15. Inspectors observed visible emissions leaking from the following ovens, offtake piping, and oven components from 12:30 and 12:52 pm:

Time	Oven Number	Area of Oven Leaking	
12:30 pm	1	Push side, top of oven door and chuck door	
12:30 pm	3	Push side, top of oven door	
12:33 pm	5	Push side, top of oven door	
12:34 pm	7	Push side, top of oven door and chuck door	
12:36 pm	10	Push side, top of oven door and chuck door, and standpipe	
12:36 pm	11	Push side, top of oven door and chuck door	
12:36 pm	16	Push side, top of oven door	
12:37 pm	19	Push side, top of oven doo and chuck door	

12:37 pm	22	Push side, top of oven door
12:37 pm	24	Push side, chuck door
12:38 pm	27	Push side, top of oven door
12:43 pm	40	Push side, top of oven door
12:43 pm	42	Push side, top of oven door
12:45 pm	48	Push side, top of oven door
12:47 pm	54	Push side, top of oven door and standpipe
12:47 pm	58	Push side, top of oven door and standpipe
12:48 pm	63	Push side, top of oven door, gooseneck, and standpipe
12:48 pm	67	Push side, top of oven door and standpipe
12:49 pm	70	Coke side, top of door and standpipe
12: 50 pm	72	Coke side, top of door and standpipe
12:50 pm	69	Coke side, top of door and standpipe
12:50 pm	68	Coke side, top of door and standpipe
12:52 pm	64	Coke side, top of door and standpipe
12:52 pm	71	Coke side, top of door and standpipe

Observations were performed in accordance with Ohio SIP Rules 3745 17-03(B), 3745 17-07(B)(2)(d)(ii) and 3745 17-07(B)(2)(b). OAC Rule 3745 17-07(B)(2)(d)(ii) requires that at no time shall there be visible fugitive particulate emissions from more than ten percent of the oven

doors, and 3745 17-07(B)(2)(b) requires that at no time shall there be visible fugitive particulate emissions from more than 10% of the offtake piping. Based on the data collected during observations at oven doors, visible fugitive particulate emissions were leaking from AK Steel's Wilputte Battery from 14 out of 152 doors during one observation, at a rate of 9.2%, and from 24 out of 152 doors during the second observation, at a rate of 15.8%. Based on observations at offtake piping, visible fugitive particulate emissions were leaking from AK Steel's offtake piping, as defined at OAC 3745-17-03(B), from offtake piping components associated with 21 out of 152 ovens, at a rate of 13.8%.

Separately, two EPA Region 5 scientists performed Geospatial Monitoring of Air Pollution (GMAP), using a portable meteorological tower, a DUVAS analyzer, and Picarro cavity ringdown spectroscopy analyzer, to measure BTEX, SO2, and other VOC at fixed points near the battery. The GMAP report will be documented separately.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were taken during this inspection.

CLOSING CONFERENCE

We thanked AK Steel personnel for their time and told that we would follow up with a copy of the inspection report when it was completed. We confirmed that nothing we had discussed was Confidential Business Information. We stated that we may issue a Section 114 Information Request or follow up with questions via phone or email.

ATTACHMENTS

Attachment A: AK Inspection Media (in CD format)

Attachment B: AK Inspection Media Log

SIGNATURES	1	<u> </u>	0			
Report Author:	-lu	XI-	6, 6	241	Date:	7/12/2018
Section Chief:	Burn	Volicus	<u>. </u>		Date: _	7/12/18

Attachment B: AK Inspection Media Log

Photo Log

80001.JPG 80002.JPG 80003.JPG 80004.JPG 80005.JPG 80009.JPG	zone and DST) 7/10/2018 20:48 7/10/2018 20:48 7/10/2018 20:48 7/10/2018 20:48 7/10/2018 20:48 7/10/2018 20:49 7/10/2018 20:49 7/10/2018 20:49	39.478452, -84.386352 39.478435, -84.386293 39.478333,	of Image Combustion stack Flaring Opacity from BOF and flaring Opacity from BOF and flaring Opacity from BOF and flaring Coke plant opacity Coke plant opacity from BOF
80003.JPG 80004.JPG 80005.JPG 80008.JPG	7/10/2018 20:48 7/10/2018 20:48 7/10/2018 20:48 7/10/2018 20:49 7/10/2018 20:49	-84.386352 39.478435, -84.386293	Flaring Opacity from BOF and flaring Opacity from BOF and flaring Opacity from BOF and flaring Coke plant opacity Coke plant
80003.JPG 80004.JPG 80005.JPG 80008.JPG	7/10/2018 20:48 7/10/2018 20:48 7/10/2018 20:48 7/10/2018 20:49 7/10/2018 20:49	-84.386352 39.478435, -84.386293	Opacity from BOF and flaring Opacity from BOF and flaring Opacity from BOF and flaring Coke plant opacity Coke plant
80005.JPG 80008.JPG 80009.JPG	7/10/2018 20:48 7/10/2018 20:49 7/10/2018 20:49	-84.386352 39.478435, -84.386293	Opacity from BOF and flaring Opacity from BOF and flaring Coke plant opacity Coke plant Opacity
80008.JPG 80009.JPG	7/10/2018 20:49 7/10/2018 20:49	-84.386352 39.478435, -84.386293	from BOF and flaring Coke plant opacity Coke plant Opacity
80009.JPG	7/10/2018 20:49	-84.386352 39.478435, -84.386293	Coke plant opacity Coke plant Opacity
		39.478435, -84.386293	Opacity
80010.JPG	7/10/2018 20:49		
		-84.386111	BOF/taconit
80011.JPG	7/10/2018 20:49	39.478333, -84.386111	e area Opacity from BOF/taconit e area
80012.ЉG	7/10/2018 20:49	39.481013, -84.385482	Coke plant catwalk
80013.JPG	7/10/2018 20:49	39.481013,	Opacity from coke
80014.JPG	7/10/2018 20:49	-84.385482 39.480973,	Opacity from coke
80015.JPG	7/10/2018 20:49	39.480973,	Opacity from coke
80016.JPG	7/10/2018 20:49	39.480295,	Opacity from offtake
	7/10/2018 20:49	39.480192,	piping Opacity from offtake piping
		80016.JPG 7/10/2018 20:49	-84.385472 80016.JPG 7/10/2018 20:49 39.480295, -84.3844

16	P5080018.JPG	7/10/2018 20:49	39.480073,	Opacity
			Í	from offtake
			-84.384357	piping
17	P5080019.JPG	7/10/2018 20:49	39.480025,	Opacity
			Í	from offtake
			-84.38436	piping
18	P5080020.JPG	7/10/2018 20:49	39.480023,	Opacity
•				from offtake
			-84.384348	piping
19	P5080021.JPG	7/10/2018 20:49	39.480023,	Opacity
	,			from offtake
			-84.384348	piping
20	P5080022.JPG	7/10/2018 20:49	39.48005,	Opacity
				from offtake
i			-84.384362	piping
21	P5080023.JPG	7/10/2018 20:49	39.480048,	Opacity
			, , , , , ,	from offtake
			-84.384355	piping
22	P5080024.JPG	7/10/2018 20:49	39.480048,	Opacity
				from offtake
			-84.38434	piping
23	P5080025.JPG	7/10/2018 20:49	39.480045,	Opacity
				from offtake
			-84.384332	piping
24	P5080026.JPG	7/10/2018 20:49	39.480018,	Opacity
			Í	from offtake
			-84.38441	piping
25	P5080027.JPG	7/10/2018 20:49	39.480018,	Opacity
			,	from offtake
			-84.38441	piping
26	P5080028.JPG	7/10/2018 20:49	39.480018,	Opacity
				from offtake
			-84.38441	piping
27	P5080029.JPG	7/10/2018 20:49	39.479998,	Opacity
				from offtake
			-84.384412	piping
28	P5080030.JPG	7/10/2018 20:49	39.479997,	Opacity
				from offtake
7.000			-84.384412	piping
29	P5080031.JPG	7/10/2018 20:49	39.480005,	Opacity
				from offtake
			-84.384423	piping
30	P5080032.JPG	7/10/2018 20:49	39.48,	Opacity
				during
			-84.384444	production
31	P5080033.JPG	7/10/2018 20:49	39.480123,	Jeff Carney,
				operations
			-84.384747	manager

32	P5080034.JPG	7/10/2018 20:49	39.479917,	Opacity during
			-84.384768	production
33	P5080035.JPG	7/10/2018 20:49	39.479952,	Opacity
				during
			-84.384885	production
34	P5080036.JPG	7/10/2018 20:49	39.479685,	safety vest
			-84.385263	
35	P5080037.JPG	7/10/2018 20:49	39.479687,	blurred
				photo of
			-84.385262	ovens
36	P5080038.JPG	7/10/2018 20:49	39.479687,	Opacity near
			0.4.00.50.00	combustion
	D500000 TDG	5/10/2010 20 40	-84.385262	stack
37	P5080039.JPG	7/10/2018 20:49	39.479697,	Opacity near
			04.2051.60	combustion
20	DC000040 IDC	7/10/2018 20 40	-84.385168	stack
38	P5080040.JPG	7/10/2018 20:49	39.479727,	Opacity near combustion
			-84.385108	stack
39	P5080041.JPG	7/10/2018 20:49	39.479722,	Opacity near
39	F3080041.JFG	//10/2018 20.49	39.479722,	combustion
			-84.385	stack
40	P5080042.JPG	7/10/2018 20:49	39.479805,	Opacity near
70	1 3000042.51 G	7/10/2010 20.49	37.477603,	combustion
			-84.385128	stack
41	P5080043.JPG	7/10/2018 20:49	39.479837,	Opacity
			1,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	during
			-84.38502	production
42	P5080044.JPG	7/10/2018 20:49	39.479853,	Opacity
				during
			-84.385005	production
43	P5080045.JPG	7/10/2018 20:49	39.479853,	Opacity
				during
			-84.385005	production
44	P5080046.JPG	7/10/2018 20:49	39.479878,	Opacity
				during
			-84.385028	production
45	P5080047.JPG	7/10/2018 20:49	39.479862,	Opacity
				during
			-84.385018	production
46	P5080048.JPG	7/10/2018 20:49	39.479912,	Opacity near
			04.004000	larry car
			-84.384808	during
477	DC000040 TDC	7/10/2018 20 10	20.470010	production
47	P5080049.JPG	7/10/2018 20:49	39.479912,	Opacity near
			04 204000	larry car
			-84.384808	during
L				production

48	P5080050.JPG	7/10/2018 20:49	39.479913,	Opacity
			04.004015	during
49	P5080051.JPG	7/10/2018 20 40	-84.384817	production
49	P3080051.JPG	7/10/2018 20:49	39.479913,	Opacity
			04.00401	during
50	DC000050 IDC	7/10/0010 20 40	-84.384817	production
50	P5080052.JPG	7/10/2018 20:49	39.479913,	Opacity
			04 204017	during
51	P5080053.JPG	7/10/2018 20 40	-84.384817	production
31	P3080033.JPG	7/10/2018 20:49	39.479913,	Opacity
			04.204017	during
52	P5080054.JPG	7/10/2018 20 40	-84.384817	production
32	P5080054.JPG	7/10/2018 20:49	39.479907,	Opacity
			04.204022	during
53	P5080055.JPG	7/10/2018 20:49	-84.384822	production
23	F3080033.JPG	//10/2018 20:49	39.479905,	Opacity
			04.204015	during
54	P5080056.JPG	7/10/2018 20:49	-84.384815	production
34	P3080036.JPG	//10/2018 20:49	39.479903,	Opacity
			04 204012	during
55	P5080057.JPG	7/10/2018 20:50	-84.384812	production
33	F3080037.JPG	//10/2018 20:50	39.4799,	Opacity
		•	-84.384813	during
56	P5080058.JPG	7/10/2018 20:50		production
50	13000038.3FG	7/10/2018 20:30	39.479902,	Opacity
			-84.384813	during production
57	P5080059.JPG	7/10/2018 20:50	39.479902,	
J į	1 3000039.31 G	1/10/2018 20:30	39.479902,	Opacity during
			-84.384815	production
58	P5080060.JPG	7/10/2018 20:50	39.479902,	Opacity
	130000000000000000000000000000000000000	7710/2010 20:30	37.47702,	during
			-84.384815	production
59	P5080061.JPG	7/10/2018 20:50	39.479903,	Opacity
		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	33.173303,	during
			-84.384815	production
60	P5080062.JPG	7/10/2018 20:50	39.479903,	Opacity
			,	during
			-84.384815	production
61	P5080063.JPG	7/10/2018 20:50	39.479902,	Opacity
			,	during
			-84.384815	production
62	P5080064.JPG	7/10/2018 20:50	39.479903,	Opacity
				during
			-84.384815	production
63	P5080065.JPG	7/10/2018 20:50	39.479893,	Opacity
				during
			-84.384818	production

64	P5080066.JPG	7/10/2018 20:50	39.479893,	Opacity
			04 204010	during
			-84.384818	production
65	P5080067.JPG	7/10/2018 20:50	39.479903,	Opacity
				during
			-84.384825	production
66	P5080068.JPG	7/10/2018 20:50	39.479903,	Opacity
				during
···			-84.384825	production
67	P5080069.JPG	7/10/2018 20:50	39.479902,	Opacity
				during
			-84.384832	production
68	P5080070.JPG	7/10/2018 20:50	39.479923,	Larry car
				rail, topside
			-84.384853	
69	P5080071.JPG	7/10/2018 20:50	39.479923,	Larry car,
				rail, and
			-84.384853	pushermen
70	P5080072.JPG	7/10/2018 20:50	39.4799,	Opacity
				from offtake
			-84.384848	piping
7 1	P5080073.JPG	7/10/2018 20:50	39.4799,	Opacity
				from offtake
			-84.384848	piping
72	P5080074.JPG	7/10/2018 20:50	39.4799,	Opacity
				from offtake
			-84.384848	piping
73	P5080075.JPG	7/10/2018 20:50	39.479902,	Opacity
				from offtake
			-84.384852	piping
74	P5080076.JPG	7/10/2018 20:50	39.4799,	Opacity
:				from offtake
			-84.384855	piping
75	P5080077.JPG	7/10/2018 20:50	39.479905,	Opacity
				from offtake
			-84.384858	piping
76	P5080078.JPG	7/10/2018 20:50	39.479907,	Opacity
				during
			-84.384855	production,
				pushermen
				with silica
				cans
77	P5080079.JPG	7/10/2018 20:50	39.47991,	Opacity
				from offtake
			-84.384858	piping
78	P5080080.JPG	7/10/2018 20:50	39.47991,	Opacity
	1		,	during
			-84.384858	production

79	P5080081.JPG	7/10/2018 20:50	39.47991,	Opacity
			04.204057	from offtake
80	P5080082.JPG	7/10/2018 20 50	-84.384857	piping
00	P3080082.JPG	7/10/2018 20:50	39.47991,	Opacity
			04.304050	from offtake
			-84.384858	piping and
81	P5080083.JPG	7/10/2018 20:50	39.47991,	near larry car
01	1 3080083.51 G	7/10/2018 20.30	39.47991,	Opacity from offtake
			-84.384858	
			-04.304030	piping and
82	P5080084.JPG	7/10/2018 20:50	39.47991,	near larry car
02	13000004.31 G	7/10/2018 20.30	33.47331,	Opacity from offtake
		-	-84.384858	piping and
			-64.364636	near larry car
83	P5080085.JPG	7/10/2018 20:50	39.47991,	Opacity
05	15000005.51	7/10/2018 20:30	39.47991,	from offtake
	·		-84.384858	piping and
			-04.564656	near larry car
84	P5080086.JPG	7/10/2018 20:50	39.47991,	Opacity
	12000000.31	771072010 20.30	37.7771,	from offtake
			-84.384858	piping and
			04.504050	near larry car
85	P5080087.JPG	7/10/2018 20:50	39.47991,	Opacity
		1,710,2010 20.00	33.17331,	from offtake
			-84.384858	piping and
				near larry car
86	P5080088.JPG	7/10/2018 20:50	39.47991,	Opacity
			Í	from offtake
_			-84.384858	piping and
7710				near larry car
87	P5080089.JPG	7/10/2018 20:50	39.479915,	Opacity
				from offtake
		•	-84.384865	piping and
				near larry
				car,
		,		pusherman
	•			near offtake
				lid
88	P5080090.JPG	7/10/2018 20:50	39.479915,	Opacity
				from offtake
			-84.384865	piping and
				near larry
				car,
				pusherman
				near offtake
90	D5000001 IDC	7/10/0010 00 70	20.1700.7	lid
89	P5080091.JPG	7/10/2018 20:50	39.479915,	Pusherman
			04.204067	near offtake
			-84.384865	lid

	D5090002 IDC	7/10/2018 20:50	39.479915,	Pusherman
90	P5080092.JPG	//10/2018 20:50	39.479913,	near offtake
			-84.384865	lid
91	P5080093.JPG	7/10/2018 20:50	39.479915,	Pusherman
91	P5080093.JPG	//10/2018 20:30	39.479913,	near offtake
			-84.384865	lid
92	P5080094.JPG	7/10/2018 20:50	39.479915,	Pusherman
92	F 3080094.3F G	//10/2018 20.30	37.477713,	near offtake
			-84.384865	lid
93	P5080095.JPG	7/10/2018 20:50	39.479937,	Topside rail
93	1 30000 33.31 G	7/10/2010 20:30	35.175537,	1 opside run
			-84.384878	
94	P5080096.JPG	7/10/2018 20:50	39.479937,	AK
<i>7</i> T	13000030.31	77 10/2010 20:20	251175507,	personnel
			-84,384878	topside
				during
				production
95	P5080097.JPG	7/10/2018 20:50	39.479937,	Opacity
-				from offtake
		·	-84.384855	piping
96	P5080098.JPG	7/10/2018 20:50	39.479935,	Opacity
				from offtake
			-84.384857	piping
97	P5080099.JPG	7/10/2018 20:50	39.47993,	Opacity
				from offtake
			-84.384853	piping
98	P5080100.JPG	7/10/2018 20:50	39.47993,	Opacity
				during
			-84.384853	production
99	P5080101.JPG	7/10/2018 20:50	39.47993,	Opacity
				from offtake
			-84.384853	piping
100	P5080102.JPG	7/10/2018 20:50	39.47993,	Opacity
				from offtake
			-84.384852	piping
101	P5080103.JPG	7/10/2018 20:50	39.47995,	Opacity
•			0.4.00.40.67	from offtake
			-84.384867	piping
102	P5080104.JPG	7/10/2018 20:50	39.47995,	Opacity
			0.4.00.40.67	from offtake
			-84.384867	piping
103	P5080105.JPG	7/10/2018 20:50	39.47995,	Opacity
			04304077	from offtake
104	D5000105 TDC	7/10/2019 20 50	-84.384867	piping
104	P5080106.JPG	7/10/2018 20:50	39.47995,	Opacity
			04.2040/7	from offtake
105	Deconded to	7/10/2010 20 20	-84.384867	piping
105	P5080107.JPG	7/10/2018 20:50	39.47995,	Opacity
			04204977	from offtake
			-84.384867	piping

106	Р5080108.JPG	7/10/2018 20:50	39.47995,	Opacity
				during
			-84.384865	production
107	P5080109.JPG	7/10/2018 20:50	39.47995,	Opacity
				during
			-84.384865	production
108	P5080110.JPG	7/10/2018 20:50	39.47995,	Opacity
				from offtake
			-84.384865	piping, larry
				car, topside
				rail
109	Р5080111.JPG	7/10/2018 20:50	39.479948,	Opacity
				from offtake
			-84.384858	piping
110	P5080112.JPG	7/10/2018 20:50	39.479948,	Opacity
				from offtake
			-84.38486	piping
111	P5080113.JPG	7/10/2018 20:50	39.479948,	Opacity
				from offtake
	No. of the second secon		-84.38486	piping
112	P5080114.JPG	7/10/2018 20:50	39.479945,	Opacity
				from offtake
110			-84.384855	piping
113	P5080115.JPG	7/10/2018 20:50	39.479945,	Opacity
				during
7.7.4			-84.384848	production
114	P5080116.JPG	7/10/2018 20:50	39.479952,	Opacity
				during
115	D5000117 TDC	7/10/2010	-84.384843	production
115	P5080117.JPG	7/10/2018 20:50	39.479952,	Opacity
				during
11.0	D5000110 IDC	5/10/0010 00 50	-84.384843	production
116	P5080118.JPG	7/10/2018 20:50	39.479952,	Opacity
		,	0.4.00.40.40	during
117	D5000110 TDC	7/10/2010 20 50	-84.384843	production
117	P5080119.JPG	7/10/2018 20:50	39.479952,	Opacity
			04.004040	during
110	DC000120 IDC	5/10/2010 20 50	-84.384843	production
118	P5080120.JPG	7/10/2018 20:50	39.479952,	Opacity
			04.204042	during
110	D5090121 IDC	7/10/2010 20 70	-84.384843	production
119	P5080121.JPG	7/10/2018 20:50	39.479952,	Opacity
			04.004043	during
120	D5090122 IDC	7/10/2019 20 50	-84.384843	production
120	P5080122.JPG	7/10/2018 20:50	39.479952,	Opacity
			04.004040	during
121	D5090122 TDC	7/10/2019 20 50	-84.384843	production
141	P5080123.JPG	7/10/2018 20:50	39.479952,	Opacity
			04.204040	during
			-84.384843	production

122	P5080124.JPG	7/10/2018 20:50	39.479952,	Opacity during
			-84.384843	production
123	P5080125.JPG	7/10/2018 20:50	39.479952,	Opacity
			-84.384843	during production
124	P5080126.JPG	7/10/2018 20:51	39.479955,	Opacity
1.24	13000120.31 0	7/10/2018 20.51	37.177733,	during
			-84.384847	production
125	P5080127.JPG	7/10/2018 20:51	39.479962,	Opacity
				during
			-84.384867	production
126	P5080128.JPG	7/10/2018 20:51	39.479962,	Opacity
				during
			-84.384867	production
127	P5080129.JPG	7/10/2018 20:51	39.479962,	Opacity
			04.004065	from offtake
			-84.384867	piping
128	P5080130.JPG	7/10/2018 20:51	39.479957,	Opacity
			04.004065	from offtake
			-84.384865	piping
129	P5080131.JPG	7/10/2018 20:51	39.479958,	Opacity from offtake
	:		04 204075	1
100	D5000120 FDG	7/10/2018 20.51	-84.384875	piping Opacity
130	P5080132.JPG	7/10/2018 20:51	39.479967,	from offtake
			-84.384878	piping
131	P5080133.JPG	7/10/2018 20:51	39.479968,	Opacity
. 131	1 3080133.31 0	7/10/2010 20.51	39.479900,	from offtake
			-84.384883	piping
132	P5080134.JPG	7/10/2018 20:51	39.479968,	AK
152	1500015 1.51 0	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		personnel
			-84.384883	topside
				during
				production
133	Р5080135.JPG	7/10/2018 20:51	39.479968,	Opacity
				during
			-84.384883	production
134	P5080136.JPG	7/10/2018 20:51	39.479772,	Opacity
				from offtake
			-84.384625	ļ
135	P5080137.JPG	7/10/2018 20:51	39.479772,	Opacity
			04.004605	from offtake
	7.5000153 77.5	7/10/0010 00 51	-84.384625	066-1
136	P5080139.JPG	7/10/2018 20:51	39.479503,	Offtakes and
			94.294005	standpipes
105	D7000140 IDO	7/10/2019 20:51	-84.384225 20.47052	68 and 69 Offtakes and
137	P5080140.JPG	7/10/2018 20:51	39.47952,	standpipes
			-84.384207	68 and 69
			-04.38420/	1 oo and oy

138	P5080141.JPG	7/10/2018 20:51	39.4795,	Offtakes and standpipes
15-17			-84.384183	68 and 69
139	P5080142.JPG	7/10/2018 20:51	39.479498,	Collector main over
			-84.384182	67-71
140	P5080143.JPG	7/10/2018 20:51	39.479498,	Offtakes and standpipes
			-84.384182	71-72
141	P5080144.JPG	7/10/2018 20:51	39.479498,	Offtakes and standpipes
			-84.384182	74-76
142	P5080145.JPG	7/10/2018 20:51	39.479498,	Offtakes and standpipes
			-84.384182	74-76
143	P5080146.JPG	7/10/2018 20:51	39.479498,	Offtakes and standpipes
7			-84.384175	66-70

Video Log

File Name	Date and Time (incl. time zone and DST)	Latitude and Longitude	Description of Video
P5080006.MOV	7/10/2018 20:48		Accidental video started
P5080007.MOV	7/10/2018 20:48		Coke Battery - Push Side